

# Halibut Anglers

## **Act by Sept 6th or your fish will be cut in half The Feds Want A BITE Of Your Fish**

### **REDUCING THE NUMBER OF BOATS AND THE BAG LIMIT:**

This year new regulations restrict your choice of boats available to take you halibut fishing. Now, in addition to the reduced number of boats, the federal government is trying to cut your bag limit in half for guided recreational anglers.

### **WHAT THAT MEANS TO YOU AS A RECREATIONAL**

**FISHERMAN:** Right now, you are allowed 2 fish per day of any size in Southcentral Alaska. If the federal rule passes, the daily bag limit would drop to 1 fish per guided angler and could ultimately drop to 1 fish of a maximum size per person.

### **IS THIS "FAIR & EQUITABLE"?**

The established Guideline Harvest Level was deemed fair and equitable by the Courts and Secretary of Commerce, but now they want to cut your allocation by another 30%. The fish taken from you would be given to the commercial sector. The commercial sector would then allow you to catch your second fish by



paying them an additional fee.

### **IS THIS ABOUT CONSERVATION?**

**NO!** The halibut you are losing will be caught by the commercial fleet. Is this fair?

### **WHAT ABOUT THE BYCATCH?**

Trawl vessels drag nets on the ocean floor or in mid-water and scrape up everything, pick out the fish they want and throw the rest overboard. The total halibut discarded in 2010 was 11,433,055 million pounds of dead fish (mostly by the trawl fisheries). This is much more than the total recreational catch. This should be a concern to both recreational and commercial fishermen who fish hook-and-line.

**WHO WILL THIS AFFECT?** It will affect you by taking away your fish and reducing the money that circulates throughout businesses in the state. Recreational fishing brings millions of dollars to the Alaskan economy. Local governments and services depend on the sales tax revenue generated by anglers and their families.

## **This is not Hopeless! What Can You Do?**

**1. IT IS CRITICAL THAT YOU SUBMIT A LETTER** before the comment period ends on September 6th. Address comments to: Glenn Merrill, NMFS, Attn: Ellen Sebastian. P.O. Box 21668, Juneau, AK 99802-1668 or Fax: 907-586-7557. In your letter, reference federal rule #0648-BA37 and ask them to support your current bag limit.

**2. LEARN MORE** by visiting the Alaska Charter Association website at [www.alaskacharter.org](http://www.alaskacharter.org), where you can print, fax or mail a sample comment letter. **MAKE A DONATION** through the ACA website and contribute to the battle to preserve the recreational halibut fishery.

**3. CONTACT THESE PEOPLE**, ask questions, make comments, and fax or email letters:

Acting Secretary of Commerce, Rebecca Blank- <http://www.commerce.gov/contact-us>

Dr. Jane Lubchenco, NOAA Chief Administrator- [jane.lubchenco@noaa.gov](mailto:jane.lubchenco@noaa.gov), Fax (202) 408-9674

**ALASKA RESIDENTS** contact Governor Sean Parnell, Senator Lisa Murkowski, Senator Mark Begich, Rep. Don Young. Look up contact information here: [www.electedlist.com/Alaska.html](http://www.electedlist.com/Alaska.html)

(To read the full "Catch Sharing Plan": <http://www.fakr.noaa.gov/sustainablefisheries/halibut/sport.htm>)

Glenn Merrill  
National Marine Fisheries Service,  
Attn: Ellen Sebastian  
P.O. Box 21668, Juneau, AK 99802-1668  
(FAX: 907-586-7557)  
RE: Halibut Catch Sharing Plan (**0648-BA37**)

Dear Mr. Merrill,

A viable and healthy recreational charter fishing industry is important to me because these small businesses provide safe access to our public trust marine resources, even to Americans who cannot afford their own boat. I am submitting these comments in opposition to the new Halibut Catch Sharing Plan (CSP). This re-allocation of fish from the recreational guided charter fishery to the commercial fishery is billed as a conservation measure, but would not change the catch levels -- only who gets to catch the fish. Assuming current abundance, guided anglers in Southcentral Alaska will be under a 1 fish rule, half the current guided recreational bag limit next year. Southeast is already under a 37-inch size restriction.

Why are we handing allocation decisions that affect all Americans over to an international commission? The deliberate misuse of the International Pacific Halibut Commission process permanently disenfranchises the public of the right to comment on the rulemaking. IPHC is not required to abide by the CSP matrix and could well take any action it chooses (as it did this year). The IPHC has previously been informed that domestic allocation is the responsibility of individual governments and not the IPHC, which consists of 3 Canadian and 3 American Commissioners. Canadian commissioners have no business making American domestic allocation decisions.

This rule would allow over-harvest of the combined catch limit by 3.5%. The North Council's Scientific and Statistical Committee has stated on the record that this methodology will not manage harvest within the allowable range.

At all but the very highest abundance levels, guided allocations are 30% less than our current allocation and the difference is reallocated to the commercial sector; no conservation benefit is served. Assuming current abundance, the new Area 2C allocation would be about 540 thousand pounds, 31.5% less than the current allocation of 788 thousand pounds. Area 3A would get an allocation of 2.52 million pounds, 30.9% less than the current allocation of 3.65 million pounds.

I understand there is a new provision in this rule called "Guided Angler Fish" (GAF) that would allow recreational halibut anglers to lease fishing privileges for up to 2 fish of any size from owners of commercial catch shares, or IFQs. With commercial halibut selling dockside at up to \$7/lb, a GAF fish could easily cost \$150.00. GAF is not a permanent allocation transfer mechanism: it is the annual renting of fish – our public trust resource.

The economic and social analysis in the proposed rule is sorely deficient, being based on 13 year-old data for the charter fishing industry. I support the alternative developed by the charter fishing industry that provides for catch accountability without a large reallocation of fish from the recreational fishery to the commercial sector.

Respectfully,

Add your personal comment here:

Signed:

Print Name:

Address:

Email: